

Safety Attribute Inspection (SAI) Data Collection Tool
8.1.1 Safety Policy (OP)
Revision#: 1 Revision Date: 02/17/2015

ELEMENT SUMMARY INFORMATION

Scope of Element:

Purpose (certificate holder's responsibility): To develop and implement an integrated, comprehensive Safety Management System (SMS) safety policy for its entire organization appropriate to the size, scope, and complexity of their operation. The safety policy will define and commit the organization to achieving safety objectives and ensure compliance with Title 14 Code of Federal Regulations (14 CFR).

Objective (FAA's oversight responsibility): To determine if the certificate holder's SMS Safety Policy Component:

- Meets all applicable requirements of Title 14 of the Code of Federal Regulations (14 CFR) and FAA policies, and
- Is appropriate to the size, scope, and complexity of their operation.

Specific Instructions:

Questions contained in this element are designed to evaluate the certificate holder's SMS as stated in the "Scope of Element" section. This assessment includes questions designed to evaluate the inclusion of key elements in a robust SMS. This information gives the PI the ability to perform an accurate bottom-line assessment of the certificate holder's SMS considering size/scope/complexity of the certificate holder.

BACKGROUND INFORMATION:

A Safety Management System (SMS) is a *complete system* consisting of four foundational Components: Safety Policy, Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion.

Each Component is addressed by 14 CFR part 5 requirements (Safety Policy - Subpart B, SRM - Subpart C, SA - Subpart D, and Safety Promotion - Subpart E).

Inspectors using this Data Collection Tool (DCT) may notice some questions only address specific subparts of part 5. Some part 5 requirements address all four components in one subpart.

Consequently, the inspector will not see all subpart requirements in one SMS DCT. No duplicate questions appear in System 8 DCTs.

For example, a question about SRR 5.25(c)(4) appears in DCT 8.4.1 because that regulation's subpart relates to Safety Promotion, and DCT 8.4.1 is the Safety Promotion DCT (remaining requirements of 5.25(c) are covered in the other SMS DCT questions).

SUPPLEMENTAL INFORMATION

Regulatory Requirements:

- 5.3, General requirements
- 5.21, Safety policy
- 5.23, Safety accountability and authority
- 5.25, Designation and responsibilities of required safety management personnel
- 5.27, Coordination of emergency response planning
- 5.95, SMS documentation

Related CFRs & FAA Policy/Guidance:

Related CFRs:

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FAA Policy/Guidance:

FAA Order VS 8000.367

FAA Order 8900.1, Volume 17

AC 120-92, Safety Management Systems for Aviation Service Providers

SAI SECTION 1 - PROCEDURES ATTRIBUTE

Objective:

The questions in this section of the SAI will help verify that the certificate holder's documented procedures identify who, what, when, where, and how those procedures are accomplished. These procedures must allow all personnel to perform their duties and responsibilities with a high degree of safety.

14 CFR part 121.135(a)(1)

Tasks

	The inspector shall accomplish the following tasks:
1	Review the information in the Supplemental Information section of this SAI.
2	Review the duties and responsibilities for management and other personnel who accomplish the processes associated with this element.
3	Review the documentation of the processes associated with this element.

Questions

1.1	<p>Does the certificate holder's SMS have a Safety Policy Component that is in accordance with 14 CFR, Part 5, Subpart B, Safety Policy?</p> <p>Note(s): <i>This question addresses the SMS Safety Policy Component in its entirety and is best answered after responding to all other questions within this component. When a response to ANY of the following questions is 'NO' then you must also answer this question with a 'NO'.</i></p> <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.3(a)(1) Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2	<p>Is the certificate holder's SMS appropriate to the size, scope, and complexity of their operations?</p> <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.3(a) Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.3	<p>Does the certificate holder's SMS have a safety policy that includes at least the following minimum requirements:</p> <ul style="list-style-type: none"> • The certificate holder's safety objectives; • A commitment of the certificate holder to fulfill the organization's safety objectives; • A clear statement to commit the necessary resources for the implementation of the SMS; • A safety reporting policy that defines requirements for employee reporting of safety hazards or issues; • A policy that defines unacceptable behavior and conditions for disciplinary action; and • An emergency response plan that provides for the safe transition from normal to emergency operations in accordance with the requirements of 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	<p>14 CFR part 5.27, Coordination of emergency response planning?</p> <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.21(a) Kind Of Question: Flag, Supplemental, Domestic</p>	
1.4	<p>Do the certificate holder's safety management processes require their safety policy be:</p> <ul style="list-style-type: none"> Signed by the accountable executive (described in 14 CFR part 5.25); Documented and communicated throughout the certificate holder's organization; and Regularly reviewed by the accountable executive to ensure it remains relevant and appropriate to the certificate holder? <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.21(b); 5.21(c); 5.21(d) Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.5	<p>Does the certificate holder's safety management safety policy define accountability for safety to all organizational personnel, specifically:</p> <ul style="list-style-type: none"> The accountable executive (described in 14 CFR part 5.25); All members of management in regard to developing, implementing, and maintaining SMS processes within their area of responsibility; and Employees relative to the certificate holder's safety performance? <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.23(a)(1); 5.23(a)(2); 5.23(a)(3) Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.6	<p>Does the certificate holder identify an accountable executive who, irrespective of other functions, satisfies the following:</p> <ul style="list-style-type: none"> Is the final authority over operations authorized to be conducted under the certificate holder's certificate(s); Controls the financial resources required for the operations to be conducted under the certificate holder's certificate(s); Controls the human resources required for the operations authorized to be conducted under the certificate holder's certificate(s); and Retains ultimate responsibility for the safety performance of the operations conducted under the certificate holder's certificate(s)? <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.25(a) Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.7	<p>Do the certificate holder's safety management processes require the accountable executive to accomplish the following:</p> <ul style="list-style-type: none"> Ensure that the SMS is properly implemented and performing in all areas of the certificate holder's organization; 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	<ul style="list-style-type: none"> • Develop and sign the safety policy of the certificate holder; • Communicate the safety policy throughout the certificate holder's organization; • Regularly review the certificate holder's safety policy to ensure it remains relevant and appropriate to the certificate holder; and • Regularly review the safety performance of the certificate holder's organization and direct actions necessary to address substandard safety performance in accordance with 14 CFR part 5.75, Continuous improvement? <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.25(b) Kind Of Question: Flag, Supplemental, Domestic</p>	
1.8	<p>Does the certificate holder's safety policy require all members of management to develop, implement and maintain SMS processes within their area of responsibility to include, but not limited to, the following:</p> <ul style="list-style-type: none"> • Hazard identification and safety risk assessment; • Assuring the effectiveness of safety risk controls; • Promoting safety as required in 14 CFR Part 5, Subpart E, Safety Promotion; and • Advising the accountable executive on the performance of the SMS and on any need for improvement? <p>Note(s): <i>This question/process includes owners of operational processes (Managers, Directors, etc.) at the decisional level across the organization.</i></p> <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.23(a)(2) Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.9	<p>Does the certificate holder's safety management documentation identify the levels of management with the authority to make decisions regarding safety risk acceptance for the company?</p> <p>Note(s): <i>This question/process includes owners of operational processes (Managers, Directors, etc.) at the decisional level across the organization.</i> <i>Documentation Definition (reference FAA VS Order 8000.367) - Information or meaningful data and its supporting medium (e.g., paper, electronic) that is distinct from records because it is the written description of policies, processes, procedures, objectives, requirements, authorities, responsibilities, or work instructions.</i></p> <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.23(b) Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.10	<p>Do the certificate holder's safety management processes require the accountable executive to designate sufficient management personnel who, on behalf of the accountable executive, are responsible for:</p> <ul style="list-style-type: none"> • Coordinating the implementation, maintenance, and integration of the 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	<p>SMS throughout the certificate holder's organization;</p> <ul style="list-style-type: none"> Facilitating hazard identification and safety risk analysis; Monitoring effectiveness of safety risk controls; Ensuring safety promotion is communicated throughout certificate holder's organization; and Regularly reporting to the accountable executive on the performance of the SMS and any need for improvement? <p>Note(s): <i>This question/process includes safety support personnel such as a Safety Officer, Director of Safety, Safety Department personnel, etc. and associated staff.</i> <i>Sufficient can be defined as adequate resources for the SMS to function properly (reference AC 120-92).</i></p> <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.25(c) Kind Of Question: Flag, Supplemental, Domestic</p>	
1.11	<p>Where emergency response procedures are necessary, does the certificate holder develop and does the accountable executive approve as part of the safety policy an emergency response plan that provides for the safe transition from normal to emergency operations, and that addresses at least the following:</p> <ul style="list-style-type: none"> Delegation of emergency authority throughout the organization; Assignment of employee responsibilities during the emergency; and Coordination of the emergency response plan with other affected organizations (e.g., code share partners, airports, contractors, affiliates, etc.)? <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.21(a)(6); 5.27(a); 5.27(b); 5.27(c) Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.12	<p>Does the certificate holder have a process to develop and maintain SMS documentation that describes the certificate holder's safety policy, processes and procedures?</p> <p>Note(s): <i>Documentation Definition (reference FAA VS Order 8000.367) - Information or meaningful data and its supporting medium (e.g., paper, electronic) that is distinct from records because it is the written description of policies, processes, procedures, objectives, requirements, authorities, responsibilities, or work instructions.</i></p> <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.21(c); 5.95(a) Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.13	<p>Does the certificate holder's SMS ensure compliance with the relevant regulatory standards in 14 CFR?</p> <p>Updated: Rev # 1 on 02/17/2015 SRRs: 5.3(c) Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI SECTION 1 - PROCEDURES ATTRIBUTE Drop-Down Menu		
1.	No policy, procedures, instructions, or information specified.	
2.	Procedures or instructions and information do not identify who, what, when, where, how.	
3.	Policy, procedures, or instructions and information do not comply with CFR.	
4.	Policy, procedures, or instructions and information do not comply with FAA policy and guidance.	
5.	Policy, procedures, or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen Charts, etc.).	
6.	Policy, procedures, or instructions and information unclear or incomplete.	
7.	Documentation quality (e.g., unreadable or illegible).	
8.	Policy, procedures, or instructions and information inconsistent across certificate holder manuals (FOM - Flight Operations Manual to GMM - General Maintenance Manual, etc.).	
9.	Policy, procedures, or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).	
10.	Resource requirements incomplete (personnel, facilities, equipment, technical data).	
11.	Other.	

SAI SECTION 2 - CONTROLS ATTRIBUTE	
Objective: SMS Element Section 2 objective Text	
Tasks Intentionally left blank	

Questions		

SAI SECTION 2 - CONTROLS ATTRIBUTE Drop-Down Menu	
1.	No controls specified.
2.	Documentation for the controls do not identify who, what, when, where, how.
3.	Controls incomplete.
4.	Controls could be circumvented.
5.	Controls could be unenforceable.
6.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
7.	Other.

SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE	
Objective: SMS Element Section 3 objective Text	
Tasks	
	Intentionally left blank

Questions		

SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE Drop-Down Menu	
1.	No process measurements specified.
2.	Documentation for the process measurements does not identify (who, what, when, where, how).
3.	Inability to identify negative findings.
4.	No provisions for implementing corrective actions.
5.	Ineffective follow-up to determine effectiveness of corrective actions.
6.	Resources requirements (personnel, facilities, equipment, technical data).
7.	Other.

SAI SECTION 4 - INTERFACES ATTRIBUTE	
Objective: SMS Element Section 4 objective Text	
Tasks	
	Intentionally left blank

Questions		

SAI SECTION 4 - INTERFACES ATTRIBUTE Drop-Down Menu	
1.	No interfaces specified.
2.	The following interfaces not identified within the certificate holder's manual system:
3.	Interfaces listed are inaccurate.
4.	Specific location of interfaces not identified within the manual system.
5.	Other

SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTE	
Objective: SMS Element Section 5 objective Text	
Tasks	
	Intentionally left blank

Questions		

SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTE Drop-Down Menu	
1.	Not documented.
2.	Documentation unclear.
3.	Documentation incomplete.
4.	Other.